

Chief, Standardization Branch  
Livestock and Seed Program  
Agricultural Marketing Service, USDA  
Room 2603-S, Stop 0254  
1400 Independence Ave., S.W.  
Washington, DC 20250-0254

March 24, 2003

To the Chief of the Standardization Branch,

On behalf of the Rocky Mountain Farmers Union (RMFU), I would like to submit these comments in regard to Docket No. LS-02-02. RMFU represents family farmers and ranchers in Colorado, New Mexico and Wyoming, with a membership of approximately 23,000. Through its Cooperative Development Center, RMFU works closely with a number of producers and producer groups to help them find new and innovative ways to market directly to consumers. As such, many of our producers benefit from claims that their meat products are grassfed, hormone or antibiotic-free, or aged a certain amount of time.

While most of the claims related to live animal production listed in the proposed United States Standards for Livestock and Meat Marketing Claims are appropriate, RMFU does take issue with the proposed claim for grassfed products. At present, the proposal states "*Grass Fed – Grass, green or range pasture, or forage shall be 80% or more of the primary energy source throughout the animal's life cycle.*" RMFU agrees that the primary energy source should be from grass, green or range pasture, or forage for grassfed animals. However, RMFU finds the requirement that these primary energy sources make up a minimum of 80% of an animal's lifecycle to be inadequate and counterproductive.

Along with claims that grassfed animal production is less stressing to and more healthy for the animal and better for the environment, many consumers choose to purchase grassfed meat and dairy products based on documented nutritional differences. Grassfed animals result in leaner meats with fewer calories than grain fed animals. Likewise, grassfed meat contains higher levels of omega-3 fatty acids and conjugated linoleic acids (CLA's), both of which are cancer fighting agents and are beneficial to cellular development when consumed.

However, in order to have this level of nutritional benefit in grassfed animals, the animals must not be fed grain products. From our preliminary research, it appears that the level of starch in an animal's diet directly impacts the levels of "good" and "bad" fats found in the meat products. Grain-fed animals receive high levels of starch in their diets, while animals reared on grasses, legumes and forages receive very low levels of starch. (Most grasses and forages contain between 15% and 30% starch.)



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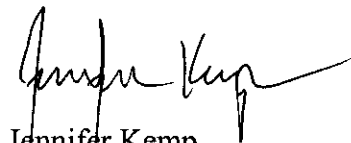
web site: [www.rmfu.org](http://www.rmfu.org)

To maintain the integrity of grassfed labeled products, RMFU recommends that the meat marketing claim for grassfed products be revised to reflect the following:

- 1. From birth to harvest, grassfed animals are grazed on grasses, legumes and forages as 95% or more of their primary energy source, and have received only those seasonal supplements, such as mineral blocks or salt licks, that do not exceed 30% starch content.**
- 2. Furthermore, animals have *not* been:**
  - a. *Creep fed as calves.* The purpose of creep feeding is to accustom an animal's intestines to large amounts of grain. This is not a necessary, nor an acceptable, method for feeding grassfed animals.**
  - b. *Fed for extended periods of time in confinement.***
  - c. *Finished on grains.* As stated earlier, grain feeding destroys the nutritional benefits of grassfed products.**

RMFU hopes that these recommendations will be incorporated into the new Livestock and Meat Marketing Claims. Thank you for taking the time to review these comments. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,



Jennifer Kemp  
Director of Government Relations